

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 ORACLE AMERICA, INC.

12 Plaintiff,

13 v.

14 GOOGLE INC.

15 Defendant.

16 Case No. CV 10-03561 WHA

17 **DECLARATION OF BENJAMIN
BECK IN SUPPORT OF ORACLE'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL CERTAIN
DISCOVERY PRICING
INFORMATION**

18 Dept.: Courtroom 8, 19th Floor
19 Judge: Honorable William H. Alsup

1 I, Benjamin Beck, declare as follows:

2 1. I submit this declaration in support of Oracle's Administrative Motion to File
3 Under Seal Certain Discovery Pricing Information. I have personal knowledge of the matters set
4 forth herein and, if called to testify, could and would testify competently to the following.

5 2. SFL Data ("SFL") provides electronic discovery and project management services
6 to corporate legal departments and law firms. I have been working at SFL since 2007, and my
7 present title is Chief Client Officer. My job responsibilities include, among other things,
8 negotiating pricing with SFL's clients.

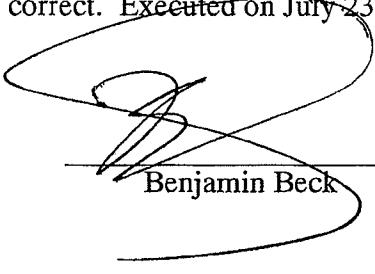
9 3. I understand that an SFL pricing estimate is being submitted in support of Oracle's
10 Objections to Google's Bill of Costs. SFL requests that this information remain under seal.

11 4. SFL considers its pricing information confidential and does not ordinarily
12 distribute it without an obligation from the recipient not to disclose it to third parties. Disclosing
13 SFL's pricing information would put SFL at a disadvantage to its competitors.

14 5. The task descriptions in the pricing estimate being submitted in this case, as well
15 as the document's structure, reveal SFL's business methods and processes, which SFL considers
16 proprietary. Disclosing this information would further disadvantage SFL competitively.

17 6. SFL thus respectfully requests that its pricing estimate, and the information
18 contained within it, be filed under seal.

19 I declare under penalty of perjury under the laws of the United States that to the best of
20 my knowledge the foregoing is true and correct. Executed on July 23, 2012, in San Francisco,
21 California.

22 
23 Benjamin Beck

1 ATTESTATION OF FILER

2 I, Daniel P. Muino, have obtained Mr. Beck's concurrence to file this document on his
3 behalf.

4 Dated: July 23, 2012

MORRISON & FOERSTER LLP

5 By: /s/ Daniel P. Muino
6 Daniel P. Muino

7 *Attorneys for Plaintiff*
ORACLE AMERICA, INC.

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